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26          *Attorneys for Plaintiff and  
27          Counterclaim-Defendant Moog Inc.*

28          MOOG INC.,

29           Plaintiff,

30           v

31          SKYRYSE, INC., ROBERT ALIN  
32          PILKINGTON, MISOOK KIM, and  
33          DOES NOS. 1-50,

34           Defendants.

CASE NO. 2:22-cv-09094-GW-MAR

**SUPPLEMENTAL FILING RE  
JOINT STIPULATION RE:  
DEFENDANTS' MOTION TO  
OVERRULE MOOG'S  
OBJECTION TO SKYRYSE'S  
DISCLOSURE OF**

1 SKYRYSE, INC.,  
2 Counterclaimant,  
3 v  
4 MOOG INC.,  
5 Counterclaim-Defendant.

**CONFIDENTIAL  
INFORMATION TO VINCENT  
SOCCHI**

**REDACTED VERSION OF  
DOCUMENT PROPOSED TO BE  
FILED UNDER SEAL**

Discovery Cut-Off: April 12, 2024  
Pre-Trial Conference: August 12, 2024

Trial: August 27, 2024

Hearing: June 28, 2023

Time: 11:00 a.m.

Judge: Hon. Margo A. Rocconi

Location: Courtroom 790, 7th Floor

12 Pursuant to Magistrate Judge Rocconi's request during today's hearing to pro-  
13 vide exemplars of agreements that its engineering employees and contractors signed  
14 when working for Moog since the parties have not been able to locate the exact  
15 agreements executed by Vincent Socchi, Moog submits the following four agree-  
16 ments. Based on Moog's due diligence, these four types of agreements were in use  
17 by Moog at the time Mr. Socchi worked for Moog as a contractor from 2005-2009.

18 Ex. A is sample Technical Services Agreement Moog used with contractors  
19 working for Moog circa 2007. Section 6B states “ [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED].” Section 10A states

24 that “[REDACTED]  
25 [REDACTED]  
26 [REDACTED].”  
27  
28

1       Ex. B is Moog's External User Statement of Responsibilities referenced in  
2 Section 4 of Ex. A. Section 2.5 states: “[REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED].”

7       Ex. C is a sample NDA referenced in Section 2.11 of Ex. B. Section 4 states  
8 “[REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED].” While Section 6 explains that the NDA lasts for 10 years, it also states  
12 that all “[REDACTED]” and  
13 “[REDACTED]”  
14 “[REDACTED].”

15       Ex. D is a sample of Moog's Form of Employee Nondisclosure and Intellec-  
16 tual Property Assignment Agreement circa 2009. Section 1.2 states: “[REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED].” Section 10, Sur-  
23 vival, states that Sections 1-5 of the Agreement shall “[REDACTED]  
24 [REDACTED]  
25 [REDACTED].”

26  
27  
28

1 Dated: June 28, 2023

Respectfully submitted,

2 **SHEPPARD, MULLIN, RICHTER  
& HAMPTON LLP**

3  
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